

MEMO ENDORSED

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June 11, 2020

Hon. Kenneth M. Karas
United States District Court
300 Quarropas Street
White Plains, New York 10601

Re: *United States v. Nicholas Pagano*, 16 Cr 641 (KMK)

Dear Judge Karas:

This letter is an application to appoint undersigned counsel pursuant to the Criminal Justice Act to represent Mr. Pagano in post-judgment proceedings seeking compassionate release pursuant to 18 U.S.C. §3582(c)(1)(A). I also ask that the appointment be nunc pro tunc as of April 3, 2020. I had previously been Mr. Pagano's CJA-appointed counsel in the underlying prosecution of this case.

Beginning April 3, 2020, I commenced work on evaluating whether a motion for compassionate release could be made for Mr. Pagano, and I filed such motion on April 8, 2020. At the Court's direction, the government responded, and on April 15, 2020, the motion was denied on exhaustion grounds without prejudice to renew. I am planning to follow up in the near future with a renewed motion.

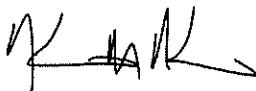
Very truly yours,

/s/ Theodore S. Green
Theodore S. Green

cc: All counsel (by ECF)

Granted.

So Ordered.



6/11/20